Richard S. Mills, Esq. (RM-0206) John P. Cookson, Esq. (JPC-9391) McElroy, Deutsch, Mulvaney & Carpenter, LLP Wall Street Plaza 88 Pine Street, 24th Floor New York, New York 10005 (212) 483.9490 Attorneys for Defendant Ambient Group, Inc.

UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE: WORLD TRADE CENTER LOWER MANHATTAN DISASTER SITE

LITIGATION

KRZYSZTOF PAJAK (and WIFE, EWA PAJAK),

Plaintiffs,

-against-

90 CHURCH STREET LIMITED PARTNERSHIP, ET AL.,

Defendants.

21 MC 102 (AKH)

INDEX NO.: 07CV4502 (AKH)

NOTICE OF ADOPTION OF AMBIENT GROUP, INC.'S ANSWER TO MASTER COMPLAINT

ELECTRONICALLY FILED

PLEASE TAKE NOTICE that Defendant, AMBIENT GROUP, INC., by its attorneys, McElroy, Deutsch, Mulvaney & Carpenter, LLP, as and for its Response to the allegations set forth in the Complaint by Adoption (Check-Off Complaint) Related to the Master Complaint filed in the above-referenced action, hereby adopts its Answer to Master Complaint dated August 2, 2007, which was filed in the matter of In Re World Trade Center Lower Manhattan Disaster Site Litigation, 21 MC 102 (AKH).

WHEREFORE, the defendant, AMBIENT GROUP, INC., demands judgment dismissing the above-captioned action as against it, together with its costs and disbursements and for such other and further relief as this Court deems just and proper.

Dated: New York, New York September 14, 2007

Yours etc.,

McElroy, Deutsch, Mulvaney & Carpenter, LLP Attorneys for Defendant Ambient Group, Inc.

Page 2 of 4

By:

Richard S. Mills (RM-0206) John P. Cookson (JPC-9391) Wall Street Plaza 88 Pine Street, 24<sup>th</sup> Floor New York, New York 10005 (212) 483.9490

TO: Worby Groner Edelman & Napoli Bern, LLP 115 Broadway, 12<sup>th</sup> Floor New York, New York 10006 (212) 267.3700

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New York, New York 10006-1404
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## **CERTIFICATE OF SERVICE**

JOHN P. COOKSON, an attorney duly admitted to practice in the Southern District of New York, hereby certifies pursuant to Fed. R. Civ. P 5, that on September 14, 2007, I caused to be served the annexed **Notice of Adoption of Ambient Group, Inc.'s Answer to Master Complaint** on the listed parties below, at the addresses designated by them for that purpose, by electronic filing in accordance with the Rules for the Southern District of New York via CM/ECF and via first class mail through the United States Postal Service.

TO: Worby Groner Edelman & Napoli Bern, LLP 115 Broadway, 12<sup>th</sup> Floor New York, New York 10006 (212) 267.3700

> Gregory J. Cannata, Esq. Law Office of Gregory J. Cannata 233 Broadway, 5<sup>th</sup> Floor New York, New York 10279 (212) 553.9206

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Thomas A. Egan, Esq. Fleming Zulack Williamson Zauderer, LLP One Liberty Plaza New York, New York 10006-1404 (212) 412.9500 Dated: New York, New York September 14, 2007

John P. Cookson (Bar Code: JC-9391)

McElroy, Deutsch, Mulvaney & Carpenter, LLP

Attorneys for Defendant,

Ambient Group, Inc.

Wall Street Plaza 88 Pine Street, 24<sup>th</sup> Floor

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